

1 [Parties and Counsel Listed on Signature Pages]
2
3
4
5
6
7
8
9

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
DISCOVERY FOR DECEMBER 11, 2024
DISCOVERY MANAGEMENT
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the December 11, 2024, Discovery Management Conference (“DMC”).

I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action

A. Meta v. State AGs

1. Format of Briefing on State Agency Document Productions

Under DMO 12, December 9 is the last date to file discovery letter briefs re: disputes concerning the production of state agency documents (Rule 34 requests or subpoenas) for 29 States. ECF 1380 at 2. The State AGs have proposed filing 5-page letter-briefs (up to 2.5 single-spaced pages per side) for each of the up-to-29 State AGs at issue, attached to a single ECF entry for the Court’s convenience. Meta has proposed to submit a common-issue brief of up to 5 single-spaced pages per side (10 pages total), followed by State-specific appendices of 0.5 single-spaced pages per side (1 page total per State). The State AGs filed an opposed administrative motion on December 4 (ECF 1407). Meta intends to file its response promptly.

2. Meta’s Commitment re Further RFPs on the State AGs.

Meta commits that it will limit service of additional RFPs on the MDL AGs with two qualitative exceptions: (1) Meta reserves the right to serve additional RFPs on the AGs for materials that fall outside the Relevant Time Period; and (2) Meta reserves the right to serve follow-up RFPs on the AGs to obtain materials concerning new developments, facts, or issues that may come to light in discovery or otherwise. The Parties request that the Court order these limitations, as it did with respect to the State AGs and PI/SD Plaintiffs. ECF 969 (DMO 7) at 2-3, 4.

B. Meta v. Plaintiffs

1. Joint stipulation re Plaintiffs’ request for compensation information for 11 Meta deponents [ECF 1318]

The Parties have reached an agreement resolving their letter-brief regarding Plaintiffs' request for compensation information in documentary form for 11 Meta deponents (ECF 1318). The Parties expect to file a stipulation memorializing their agreement before the December 11 DMC.

2. Update on Mr. Zuckerberg production

In the Order Resolving Joint Letter Brief Regarding PI/SD Plaintiffs RFPs 317, 325, 335, 344-346, and 357 as to Meta, the Court ordered Meta to "promptly search those documents for which Mr. Zuckerberg is the custodian, using only the 'meaningful social interaction' search term, limited only to documents dated within the time period from December 31, 2017 to February 28, 2018, and to process and produce with reasonably prompt diligence any non-privileged documents which result from that time-limited search," and to report on the progress of this production in the December DMC Statement. Meta reports that it has performed the search ordered by the Court and has identified ten documents that, if non-privileged, will be produced.

3. Meta and Plaintiffs' further agreement regarding hyperlinks

Meta and the Personal Injury ("PI"), School District and Local Government Entity ("SD"), and Attorney General ("AG") Plaintiffs (collectively "Plaintiffs") reached the following additional agreement regarding hyperlinks:

1. At the September 12, 2024 Discovery Management Conference, the Court ordered a process for the production of hyperlinked documents, whereby the Plaintiffs could collectively make a weekly request of Meta for 200 individual hyperlinks or hyperlinks from 50 documents, whichever was fewer, that Meta would be obligated to produce within 30 days (ECF 1189). The Court did not address whether, as a general matter, there would be terms for the expedited production of hyperlinks relevant to depositions taking place within 30 days of a request.
2. Since the Court's order, many requests for hyperlinked documents have pertained to depositions within less than 30 days of a request. The Parties recognize that there is a need to establish a process for the expedited production of hyperlinked documents so that all Parties can plan accordingly.
3. Since the Court's order and through the course of depositions, the Parties have also recognized the need to clarify questions related to the authentication of documents with embedded hyperlinks.

4. To that end, Meta confirms that: (I) it will not object in depositions on authenticity or
5 “completeness” grounds if a document is presented to a deponent without all embedded hyperlink
6 content presented with the document; and (II) to the extent Plaintiffs wish to present a document along
7 with the hyperlinked content to a witness, it will not object to the extent Meta has confirmed the “link”
8 between the document and the hyperlinked content, whether by (a) identifying or producing the
9 hyperlinked content in response to a hyperlink request from Plaintiffs, or by (b) confirming that the
10 Plaintiffs had correctly identified hyperlinked content in the existing productions.

11 5. The Parties have further agreed that, consistent with the Court’s prior rulings on this issue, Meta
12 does not agree to produce non-responsive hyperlinks (ECF 1189).

13 6. The Parties have further agreed, pending the Court’s consent, to the following timeline for
14 requesting hyperlinked documents and expedited timeline for the production of hyperlinked documents
15 relevant to a deposition within 30 days:

16 a) By 5 p.m. ET Friday, Plaintiffs can send Meta a list of up to 50 hyperlinks for which they
17 want Meta to confirm “yes, in production” or “no, not in production.” Plaintiffs will identify the
18 specific document they think the hyperlink is pointing to in the production by Bates number, or,
19 Plaintiffs will confirm they have attempted to locate such documents but were unable following
20 reasonable investigation to do so, in which case Meta will count those requested hyperlinks
21 towards Plaintiffs’ weekly allotment of 200 individual hyperlinks or hyperlinks from 50
22 documents, whichever is fewer;

23 b) By the close-of-business Tuesday, Meta confirms “yes” or “no” for the 50 hyperlinks
24 received the previous Friday. Provided Plaintiffs have identified the correct document, the
25 documents that Plaintiffs correctly identify as being associated with the document that they’re
26 linked to do not count against Plaintiffs’ weekly allotment of up to 200 hyperlinks. If Plaintiffs
27 want any of the “no’s,” they can add those to their weekly allotment of up to 200 hyperlinks;

28 c) By 5 p.m. ET Wednesday, Plaintiffs will send Meta their weekly allotment of up to 200
hyperlinks. “Meta may produce responsive, non-produced, and non-privileged internal Meta
documents found at hyperlinks contained within Meta produced documents within 30 days”
(ECF 1185);

1 d) Plaintiffs agree to make it clear in their Friday and Wednesday hyperlink requests what
 2 Deposition they are requesting the hyperlink for, so both Parties can track the limits set forth in
 3 this agreement.

4 and

5 e) For hyperlinks related to deponents (“Deposition Hyperlinks”), Meta agrees to continue
 6 prioritizing Deposition Hyperlinks for identification and production, and will endeavor to
 7 identify or produce such hyperlinks according to the following schedule:

8 i) If a deposition is scheduled more than 30 days after the receipt of a related request
 9 for hyperlinks, Meta will endeavor to identify and produce requested hyperlinks for that
 10 deponent within 30 days per the Court’s order;

11 ii) During the course of deposition preparation (i.e., less than 30 days but greater
 12 than 14 days), Plaintiffs may request up to 25 hyperlinks 25 days before the deposition
 13 and up to another 25 hyperlinks no less than 14 days before the deposition (i.e., 50
 14 hyperlinks total) and Meta will endeavor to identify and produce hyperlinks within 48
 15 hours before the deposition, provided Plaintiffs limit such requests to custodial
 16 documents for the deponent and/or documents sourced to Meta Platforms; and

17 iii) If during the course of final deposition preparation (i.e., less than 14 days but
 18 greater than 7 days), Plaintiffs realize they have missed a hyperlinks for a deponent,
 19 Plaintiffs may request up to 5 hyperlinks and Meta will endeavor to identify and produce
 20 hyperlinks within 24 hours before the deposition, provided Plaintiffs limit such requests
 21 to custodial documents for the deponent and/or documents sourced to Meta Platforms.

22 iv) All Deposition Hyperlinks requests will count towards the weekly allotment of up to
 23 200 hyperlinks.

24 v) Parties agree to meet and confer regarding adjustments around holidays if these
 25 holidays fall within 30 days of a scheduled deposition.

26 **C. YouTube and PI/SD Plaintiffs**

27 1. Update Regarding Court Order ECF 1294 Re: RFP Nos. 16 and 18:

The parties report that YouTube has completed its consultations with 13 of the 15 custodians that Plaintiffs identified pursuant to Dkt. No. 1294 (the parties agreed that YouTube would not consult the other two custodians, who are former employees). The parties continue to meet and confer to discuss YouTube's search—beyond its consultations with custodians—for additional unproduced non-privilege documents responsive to RFP Nos. 16 and 18.

II. Administrative Issues that Are Disputed or Require Court Action

The Parties report that there are no disputed administrative issues or issues requiring Court action at this time.

III. Ripe Disputes for Which Joint Letter-Briefs (“JLBs”) Have Already Been Filed or Will Be Filed Imminently

A. Meta v. PI/SD and/or State AGs Disputes

1. Meta's privilege determination in connection with deposition of Miki Rothschild (Joint Letter Brief filed on November 25, 2024 (ECF 1375)).
2. Relevant time period for Meta discovery in JCCP (Joint Letter Brief to be filed on December 6, 2024).
3. State agency discovery disputes (Joint Letter Briefs to be filed by December 9, 2024).
4. Questioning of Meta Deponents re Compensation (Joint Letter Brief to be filed by December 10, 2024).

B. Snap v. PI/SD Disputes

1. Whether Plaintiffs' pending interrogatories exceed the Court's limits (Joint Letter Brief to be filed on December 9, 2024).

C. TikTok v. PI/SD Disputes

1. Whether Plaintiffs' pending interrogatories exceed the Court's limits (Joint Letter Brief to be filed on December 6, 2024).

D. Defendants v. Clevenger PI Bellwether Plaintiff

1. Dispute concerning Defendants' request to depose expert regarding Clevenger device (Joint Letter Brief to be filed on December 5, 2024).

1 **IV. Unripe Disputes**

2 **A. Meta and Snap Defendants v. Plaintiffs**

3 1. Stipulated Source Code Protective Order.

4 **B. Defendants v. PI Bellwether Plaintiffs**

5 1. Parent/witness attendance at depositions.

6 2. Depositions of witnesses identified on PI Plaintiffs' initial disclosure lists.

7 3. RFPs held in abeyance by JCCP plaintiffs.

8 4. Responses/updates to PI Bellwether Common Interrogatories No. 2.

9 5. Process for third parties M.S. and R.T. to search for and produce responsive

10 documents.

11 6. Proposed Rule 45 subpoena to Microsoft for a PI Bellwether's GroupMe account.

12 7. Defendants' productions of structured data responsive to PI Bellwether-specific

13 RFPs.

14 **C. Defendants v. SD Bellwether Disputes**

15 1. Dekalb, Jordan, and St. Charles District-specific RFPs.

16 2. Baltimore custodians.

17 3. Preservation/collection and litigation hold issues.

18 **D. Meta v. PI/SD and/or AG Plaintiffs**

19 1. Meta's response to Interrogatory No. 1.

20 2. Meta's privilege log.

21 3. Dispute between SD Plaintiffs and Meta concerning RFP Nos. 3 and 9 from Set

22 A.

23 4. Length of depositions of certain Meta executives.

24 5. Meta's responses to Plaintiffs' Second Set of Interrogatories.

25 6. Meta's written interrogatory responses from Meta Related Actions.

26 **E. Meta v. State AGs**

27 1. State AGs' responses and objections to Meta's First Set of Interrogatories.

- 1 2. Limits on Meta's depositions of State AGs and state agencies.
- 2 3. Meta's response to the State AGs' RFPs, including RFP Nos. 64, 67, 99, 102,
- 3 112, 148-150, 151-153, 159, 160, 161, 162-163, 164, 166-169, 174, and 175.

4 **F. YouTube v. PI/SD Plaintiffs**

- 5 1. Non-Custodial Sources [ECF 1246].
- 6 2. RFPs (Set 3 [Nos. 37, 50], Set 4 [No. 56], Set 5 [Nos. 81-87], Set 6 [Nos. 103-
- 7 109, 111-112], Set 10 [search terms and time period]).
- 8 3. One deponent-specific document production [time period].
- 9 4. Second Set of Interrogatories.

10 **G. TikTok v. PI/SD Plaintiffs**

- 11 1. TikTok's privilege logs and metadata relating to privilege assertions.
- 12 2. SD RFP Set A.
- 13 3. RFP 295, 296 and 282 (Foreign Investigations).
- 14 4. Preservation/collection and litigation hold issues.
- 15 5. Timing of TikTok's production of recalled lark chats.

16 **H. Snap v. PI/SD Plaintiffs**

- 17 1. Snap's production of employee communications via Snap.
- 18 2. Snap's privilege redactions of information related to users under the age of 13.
- 19 3. Snap's identification of a date for Rule 30(b)(6) deposition regarding age verification and age inference.

1 Respectfully submitted,

2 DATED: December 4, 2024

3 By: /s/ Lexi J. Hazam
4 LEXI J. HAZAM
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
5 275 BATTERY STREET, 29TH FLOOR
SAN FRANCISCO, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

6
7 PREVIN WARREN
8 **MOTLEY RICE LLC**
9 401 9th Street NW Suite 630
Washington DC 20004
10 Telephone: 202-386-9610
pwarren@motleyrice.com

11 Co-Lead Counsel

12 CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
13 55 CHALLENGER ROAD, 6TH FLOOR
14 RIDGEFIELD PARK, NJ 07660
15 Telephone: 973-639-9100
cseeger@seegerweiss.com

16 Counsel to Co-Lead Counsel

17 JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
18 155 MONTGOMERY STREET, SUITE 900
19 SAN FRANCISCO, CA 94104
20 Telephone: 415-986-1400
jennie@andrusanderson.com

21 Liaison Counsel

22 EMILY C. JEFFCOTT
MORGAN & MORGAN
23 633 WEST FIFTH STREET, SUITE 2652
24 LOS ANGELES, CA 90071
25 Telephone: 213-787-8590
ejeffcott@forthepeople.com

26 JOSEPH VANZANDT
BEASLEY ALLEN
27 234 COMMERCE STREET

1 MONTGOMERY, LA 36103
2 Telephone: 334-269-2343
3 joseph.vanzandt@beasleyallen.com

4 Federal/State Liaisons

5 MATTHEW BERGMAN
6 GLENN DRAPER
7 **SOCIAL MEDIA VICTIMS LAW CENTER**
8 821 SECOND AVENUE, SUITE 2100
9 SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

10 JAMES J. BILSBORROW
11 **WEITZ & LUXENBERG, PC**
12 700 BROADWAY
13 NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

14 JAYNE CONROY
15 **SIMMONS HANLY CONROY, LLC**
16 112 MADISON AVE, 7TH FLOOR
17 NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

18 ANDRE MURA
19 **GIBBS LAW GROUP, LLP**
20 1111 BROADWAY, SUITE 2100
21 OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

22 ALEXANDRA WALSH
23 **WALSH LAW**
24 1050 Connecticut Ave, NW, Suite 500
25 Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

26 MICHAEL M. WEINKOWITZ
27 **LEVIN SEDRAN & BERMAN, LLP**
28 510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106

1 Telephone: 215-592-1500
2 mweinkowitz@lfsbalw.com

3 Plaintiffs' Steering Committee Leadership

4 RON AUSTIN
5 **RON AUSTIN LAW**
6 400 MANHATTAN BLVD.
7 HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

8 PAIGE BOLDT
9 **WALSH LAW**
10 4 Dominion Drive, Bldg. 3, Suite 100
11 San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

12 THOMAS P. CARTMELL
13 **WAGSTAFF & CARTMELL LLP**
14 4740 Grand Avenue, Suite 300
15 Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wccllp.com

16 SARAH EMERY
17 **HENDY JOHNSON VAUGHN EMERY PSC**
18 600 WEST MAIN STREET, SUITE 100
19 LOUISVILLE, KT 40202
Telephone: 859-600-6725
semery@justicestartshere.com

20 CARRIE GOLDBERG
21 **C.A. GOLDBERG, PLLC**
22 16 Court St.
23 Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

24 RONALD E. JOHNSON, JR.
25 **HENDY JOHNSON VAUGHN EMERY PSC**
26 600 WEST MAIN STREET, SUITE 100
27 LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

28 SIN-TING MARY LIU

**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

JOSEPH E. MELTER
KESSLER TOPAZ MELTZER & CHECK LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212-213-8311
hnappi@hrsclaw.com

**EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com**

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

**ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333**

1 rtellis@baronbudd.com
2 dfernandes@baronbudd.com

3 MELISSA YEATES
4 **KESSLER TOPAZ MELTZER & CHECK LLP**
5 280 KING OF PRUSSIA ROAD
6 RADNOR, PA 19087
7 Telephone: 610-667-7706
8 myeates@ktmc.com

9 DIANDRA "FU" DEBROSSE ZIMMERMANN
10 **DICELLO LEVITT**
11 505 20th St North
12 Suite 1500
13 Birmingham, Alabama 35203
14 Telephone: 205-855-5700
15 fu@dicelloselevitt.com

16 Plaintiffs' Steering Committee Membership

17 *Attorneys for Individual Plaintiffs*

PHILIP J. WEISER
Attorney General
State of Colorado

/s/Krista F. Batchelder
Krista F. Batchelder, CO Reg. No. 45066 *pro hac vice*
Deputy Solicitor General
Shannon W. Stevenson, CO Reg. No. 35542 *pro hac*
vice
Solicitor General
Elizabeth Orem, CO Reg. No. 58309
Assistant Attorney General

Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6384
krista.batchelder@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

ROB BONTA
Attorney General
State of California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.O'Neill@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

RUSSELL COLEMAN
Attorney General
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),
Pro hac vice

Philip Heleringer (KY Bar No. 96748),
Pro hac vice

Zachary Richards (KY Bar No. 99209),
Pro hac vice

Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice

Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice

Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGHER@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN
Attorney General
State of New Jersey

/s/ Kashif T. Chand
Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice
Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice
Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice
Mandy K. Wang (NJ Bar No. 373452021),
Pro hac vice
Deputy Attorneys General

1 New Jersey Office of the Attorney General,
2 Division of Law
3 124 Halsey Street, 5th Floor
4 Newark, NJ 07101
5 Tel: (973) 648-2052
6 Kashif.Chand@law.njoag.gov
7 Thomas.Huynh@law.njoag.gov
8 Verna.Pradaxay@law.njoag.gov
9 Mandy.Wang@law.njoag.gov

10 *Attorneys for Plaintiff New Jersey*
11 *Division of Consumer Affairs*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 COVINGTON & BURLING LLP
2

3 By: /s/ Ashley M. Simonsen
4 Ashley M. Simonsen, SBN 275203
5 COVINGTON & BURLING LLP
6 1999 Avenue of the Stars
7 Los Angeles, CA 90067
8 Telephone: (424) 332-4800
9 Facsimile: + 1 (424) 332-4749
10 Email: asimonsen@cov.com

11 Phyllis A. Jones, *pro hac vice*
12 Paul W. Schmidt, *pro hac vice*
13 COVINGTON & BURLING LLP
14 One City Center
15 850 Tenth Street, NW
16 Washington, DC 20001-4956
17 Telephone: + 1 (202) 662-6000
18 Facsimile: + 1 (202) 662-6291
19 Email: pajones@cov.com

20 *Attorney for Defendants Meta Platforms, Inc.*
21 *f/k/a Facebook, Inc.; Facebook Holdings,*
22 *LLC; Facebook Operations, LLC; Facebook*
23 *Payments, Inc.; Facebook Technologies, LLC;*
24 *Instagram, LLC; Siculus, Inc.; and Mark Elliot*
25 *Zuckerberg*

26 KING & SPALDING LLP
27

28 By: /s/ Geoffrey M. Drake
29 Geoffrey M. Drake, *pro hac vice*
30 TaCara D. Harris, *pro hac vice*
31 1180 Peachtree Street, NE, Suite 1600
32 Atlanta, GA 30309-3521
33 Telephone: (404) 572-4600
34 Facsimile: (404) 572-5100
35 Email: gdrake@kslaw.com
36 tharris@kslaw.com

37 Kristen R. Fournier, *pro hac vice*
38 KING & SPALDING LLP
39 1185 Avenue of the Americas, 34th Floor
40 New York, NY 10036-2601
41 Telephone: (212) 556-2100
42 Facsimile: (212) 556-2222
43 Email: kfournier@kslaw.com
44 David P. Mattern, *pro hac vice*

1 KING & SPALDING LLP
2 1700 Pennsylvania Avenue, NW, Suite 900
3 Washington, DC 20006-4707
4 Telephone: (202) 737-0500
Facsimile: (202) 626-3737
Email: dmattern@kslaw.com

5 Bailey J. Langner (SBN 307753)
6 KING & SPALDING LLP
7 50 California Street, Suite 3300
San Francisco, CA 94111
Telephone: (415) 318-1200
Facsimile: (415) 318-1300
Email: blangner@kslaw.com

10 Andrea Roberts Pierson, *pro hac vice*
FAEGRE DRINKER LLP
11 300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
12 Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com

14 Amy R. Fiterman, *pro hac vice*
FAEGRE DRINKER LLP
15 2200 Wells Fargo Center
90 South Seventh Street
16 Minneapolis, MN 55402
Telephone: +1 (612) 766-7768
Facsimile: +1 (612) 766-1600
Email: amy.fiterman@faegredrinker.com

19 *Attorneys for Defendants TikTok Inc., ByteDance Inc.,
TikTok Ltd., ByteDance Ltd., and TikTok LLC*

22 MUNGER, TOLLES & OLSON LLP
By: /s/ Jonathan H. Blavin
23 Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
24 560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

27 Rose L. Ehler (SBN 29652)
28 Victoria A. Degtyareva (SBN 284199)

Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degyareva@mto.com
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Email: lauren.bell@mto.com

Attorneys for Defendant Snap Inc.

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
By: /s/ Brian M. Willen
Brian M. Willen (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

Lauren Gallo White (SBN 309075)
Samantha A. Machock (SBN 298852)
WILSON SONSINI GOODRICH & ROSATI
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
Email: smachock@wsgr.com

Christopher Chiou (SBN 233587)
Matthew K. Donohue (SBN 302144)
WILSON SONSINI GOODRICH & ROSATI
953 East Third Street, Suite 100
Los Angeles, CA 90013

1 Telephone: (323) 210-2900
2 Facsimile: (866) 974-7329
3 Email: cchiou@wsgr.com
Email: mdonohue@wsgr.com

4 *Attorneys for Defendants YouTube, LLC and Google*
5 *LLC*

6 WILLIAMS & CONNOLLY LLP
7 By: /s/ *Joseph G. Petrosinelli*
Joseph G. Petrosinelli (*pro hac vice*)
jpetrosinelli@wc.com
8 Ashley W. Hardin (*pro hac vice*)
ahardin@wc.com
9 680 Maine Avenue, SW
Washington, DC 20024
10 Telephone.: 202-434-5000
11 Fax: 202-434-5029

12 *Attorneys for Defendants YouTube, LLC and Google*
13 *LLC*

14 MORGAN, LEWIS & BOCKIUS LLP
15 By: /s/ Yarden R. Zwang-Weissman
Yarden R. Zwang-Weissman (SBN 247111)
16 300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
17 Tel.: 213.612.7238
Email: yardena.zwang-weissman@morganlewis.com

18 Brian Ercole (*pro hac vice*)
600 Brickell Avenue, Suite 1600
19 Miami, FL 33131-3075
Tel.: 305.415.3416
21 Email: brian.ercole@morganlewis.com

22 Stephanie Schuster (*pro hac vice*)
1111 Pennsylvania Avenue NW
23 NW Washington, DC 20004-2541
Tel.: 202.373.6595
24 Email: stephanie.schuster@morganlewis.com

25 *Attorneys for Defendants YouTube, LLC and Google*
26 *LLC*

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 4, 2024

By: /s/ Ashley M. Simonsen